

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

13 WAYMO LLC,

14 Plaintiff,

15 vs.

16 UBER TECHNOLOGIES, INC.;
17 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

18 Defendants.

CASE NO. 3:17-cv-00939

**PLAINTIFF WAYMO LLC'S LIST OF
ORDERS AND ADMISSIONS [DKTS. 775
& 784]**

1 In accordance with the Court's Orders (Dkts. 775 & 784), Plaintiff Waymo LLC
 2 ("Waymo") hereby submits this list of references to Court Orders and admissions in briefs,
 3 admissions at hearings, and admissions (by counsel) at depositions, attached hereto as Appendix 1.
 4 This list is submitted based on information currently available to Waymo, and Waymo reserves
 5 the right to amend this list or supplement it as necessary based on further discovery and events in
 6 this litigation. Each of the items in the list falls into one or more of the relevance categories below
 7 (as indicated by letter in brackets in the list at Appendix A).

- 8 **A. Relevant to Defendants' possession, custody, or control of the downloaded materials**
- 9
- 10 **B. Relevant to Defendants' knowledge that Waymo's trade secrets were acquired through improper means and ratification of Mr. Levandowski's conduct**
- 11 **C. Relevant to Defendants' acquisition, disclosure, and/or use of Waymo's trade secrets**
- 12
- 13 **D. Relevant to Waymo's damages and/or equitable relief**
- 14 **E. Relevant to establish the timing of Defendants' duty to preserve evidence**
- 15 **F. Relevant as rebuttal if Defendants open the door to efforts taken in response to Court Orders**
- 16 **G. Relevant as rebuttal if Defendants open the door to the amount or types of discovery from Defendants as showing alleged non-use of Waymo's trade secrets**
- 17
- 18 **H. Relevant to show Defendants' inconsistent positions on important issues in the case**
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- 20
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23 DATED: July 10, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
 LLP

24 By /s/ Charles K. Verhoeven

25 Charles K. Verhoeven
 26 Attorneys for WAYMO LLC
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